

Administrative Review Summary Report

Technical Assistance and Corrective Action Plan

Agency Code: 59-7082

School Food Authority: Immanuel Ev Lutheran Sch

School(s) Reviewed: Same as above

Review Date(s): November 29-30, 2016 **Date of Exit Conference:** November 30, 2016

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the School Food Authority meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

Of immediate concern are critical area Performance Standard violations that may result in fiscal action. The identified findings, corrective action required and any documentation needed to demonstrate corrective action was completed are specified.

Please submit corrective action via email, fax or mail prior to the negotiated due date.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to School Secretary, Principal, and to the Server for the courtesies extended to me and the Public Health Nutritionist during the on-site review. I especially want to extend a heartfelt thank you to the secretary for all of the work and time spent in submitting the Off-Site Assessment Tool and documents in advance of the on-site AR! The secretary only took over the nutrition program responsibilities a year ago and has have very little training. She has done a nice job of putting a binder containing the various required program documents and resources. I hope that you found the time spent in providing technical assistance during the on-site review helpful.

The School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement and many other topics. More information can be found on our training page, along with other upcoming trainings and webinars <http://dpi.wi.gov/school-nutrition/training>.

Consider pursuing a GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the WI Department of Public Instruction and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to: <http://dpi.wi.gov/school-nutrition/training/goalorientedachievement-learning-skills>.

Both of these will help the secretary and server meeting the training requirements for their respective positions (discussed later in this AR report).

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students’ success.

For more information on this initiative, please visit <http://dpi.wi.gov/statesupt/agenda-2017>.

Review Areas

1. Meal Access and Reimbursement

Comments/Technical Assistance/Compliance Reminders:

- Just a point to clarify that carryover of free and reduced price meal benefits is a **maximum** of *30 operating days*. A new certification, either direct cert or paper application approval stops the carryover.
- Your meal counting system – Fast Direct, appears to only provide a list (called a benefit issuance list) of students eligible for free and reduced price meals. Per USDA the BI should include the students name, eligibility, type of certification, effective date (approval date for paper applications, and file run date for direct certification), and a column to document changes in status, extension of benefits, and withdrawals. If the list is numbered it can be helpful in determining the number approved for each monthly reimbursement claim. Thanks for creating this in preparation for the AR.
- Remember, if a student is extended benefits from another student in the household that was directly certified, you should make a copy of some type of documentation (likely from Fast Direct-Student Information System) to document that the students that are extended benefits live in the same household (hh). Attach the documentation to your BI list. As noted in the previous bullet point, use the Notes column to document the extension.
- If direct certification is completed just prior to assembling the back to school registration packets only the direct certification letter could go into the hh packet since each packet has the family name on the folder. This would save on some meal application printing costs. The DPI template direct certification letter has the a place to indicate the names of all directly certified students and allows the hh to notify the school if there are other students living in the household that should be extended benefits, or the option to decline the benefits.
- Be reminded that direct certification should be completed a minimum of three times per school year; on or about the start of the school year, at the 3 month mark, and at the 6 month timeframe. Another direct cert run needs to be completed in December. It may be helpful to run direct cert anytime a new student enrolls. That way if the student(s) is a direct cert match before they first meal is served it can be claimed free and the hh will not have to pay for meals.
- As a way for the secretary to gain a more thorough understanding of the free and reduced price meal and verification process and obtain some education credits for

Professional Standards, I recommend she either attend our summer training on these subject matters and/or view the webcasts on these subjects.

Findings and Corrective Action Needed:

☑ **Finding #1:** A copy of the folder distributed to households at the time of registration only contained the free and reduced price meal application form. The instructions for applying, and the parent/guardian letter were not included. The latter includes the income chart that households can use to evaluate whether they might want to apply/qualify for meal benefits. Be sure you go to the website to find each of these documents, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-instructions-1617.doc>, and <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fr-application-parentguardianletter-faq-1617.doc>.

Corrective Action Needed: Please make a few copies for any new enrollees for the balance of this school year. Submit a corrective action statement of your understanding and intent to provide all enrolled households with the correct application materials.

Verification

Comments/Technical Assistance/Compliance Reminders:

- Since there were no meal applications on file, there was no need for the school to complete the verification process this year. Again to increase the secretary's understanding about the verification process she should review the USDA Eligibility Manual, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/eligibility-manual-2016.pdf>, Section 6. We have also created a webcast on the process and one on how to complete the Verification Collection Report (VCR), <http://dpi.wi.gov/school-nutrition/training>. We completed the 2016-17 SY VCR and made a copy for your files during the onsite AR.

Meal Counting and Claiming

Comments/Technical Assistance/Compliance Reminders:

- Clarification is needed for the School Food Authority (SFA) response to #305 (c) of the OffSite Assessment Tool: FULL second meals cannot be sold to *students*, since these meals are not reimbursable, are considered ala carte or now called – Non Program Foods. NonProgram Foods sold to students are subject to meeting the Smart Snacks (SS) regulation. If the full meal was run through the SS product calculator they would most likely NOT meet allowable nutrient standards. It does not appear that students are purchasing any second lunches when reviewing the meal count records. Extra main dish/entrees (i.e. entrée from reimbursable meal) can be sold and are not subject to SS regulations. You will need to ensure the full cost of the entrée is covered however, and would need to work with Sheboygan School District to determine the average cost of the entrée.
- For #305(e) – be reminded for the 2016-17 SY all schools will need to track (since no longer reported on the monthly reimbursement claims) any Non-Program meals (e.g. adult and visitor) served; i.e. the number of meals served times the amount charged=revenue, and for

the expense - number of meals sold times the amount paid to SASD. These amounts will be reported on the annual financial report (AFR) under the line item – Non Program Foods.

- For #305(k), by July 1, 2017 all schools will need to develop an unpaid meal charge policy and inform parents about this policy. For assistance on understanding the policy/requirements refer to the USDA Unpaid Meal Charges Guidance, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>.

Findings and Corrective Action Needed:

☒ **Finding #1:** When reviewing/validating the October (review period) meal count information offsite it was clear that the required edit check had not been completed prior to submitting the monthly reimbursement claim. I appreciated the efforts made by the secretary to correctly complete the edit check before the onsite review. The edit check requirement was explained in detail during the on-site AR. It is recommended the secretary just complete the computation on the bottom of the Fast Direct monthly meal count report. There is no need to recopy the meal count onto the DPI Edit Check form.

Corrective Action Needed: Please write a statement of intent to continue to complete the edit check for each claiming period.

☒ **Finding #2:** During the review it was confirmed that Immanuel Lutheran School is not offering *reimbursable meals everyday school is in session for a full day* (predominantly occurs when the public school district is not in session). This is inconsistent with the regulations referenced on page 2 of your Joint Agreement.

Corrective Action Needed: I encourage you to contact the Food Service Director at the public school district (seller) to see if it may be possible for you to arrange for some type of meal to be ordered/delivered prior to the “off days.” With minimal training and directions on the production record or transport sheet your server should be able to easily prepare a reimbursable meal. If it is not a possibility perhaps the public school district food service staff could provide you with some easy menu suggestions that you can purchase and prepare and that would meet the meal pattern requirements.

Please follow up on this issue and detail your plans including a timeline for compliance with this regulation.

2. Meal Pattern and Nutritional Quality

Comments/Technical Assistance/Compliance Reminders:

Immanuel Evangelical Lutheran School is doing a nice job of serving reimbursable lunches to students each day. The school receives its meals from Sheboygan Area School District, which plans varied menus and offers an assortment of fresh vegetables. Thank you to nutrition program staff at the Sheboygan School District for providing organized, thorough documentation prior to the on-site review. Thank you also to the Immanuel School Secretary for answering questions before and during the review.

Leftovers: On the day of lunch observation there was a large amount of food leftover. We were told that the entrée, teriyaki chicken with rice, was not very popular. Nevertheless, there were also a lot of fresh vegetables leftover. Leftovers are recorded on the transport sheets, but the transport sheets are not given back to the central kitchen until the end of the school year. To reduce food waste and food cost, make sure to continue communicating with Sheboygan to determine a way of reducing excess food waste.

Portions: Technical assistance was given on making sure that level scoops are served to students. During meal observation, scant scoops of fruit were sometimes served. If a student didn't take any vegetables, they would be short of their required $\frac{1}{2}$ cup of fruit and/or vegetable and therefore would not have a reimbursable meal. It is important to serve portions exactly as they are planned to ensure that all meals claimed for reimbursement are indeed reimbursable.

Findings and Corrective Action Needed:

☒ **Finding #1:** Milk usage and condiment usage is not being recorded on the transport sheets, and overall. Production records and/or transport sheets are the SFA's way of proving that reimbursable meals are being served; therefore, all items offered as part of the reimbursable meal must be recorded. Since Immanuel is not receiving milk from Sheboygan, it may make sense to record milk usage on a separate sheet, but you can also start recording it on the current transport sheets if you wish. Milk usage must be recorded by type (skim white, skim chocolate, and 1% white). Any condiments offered to students must be recorded as well.

Corrective Action Needed: Please submit one week of documentation showing the planned number and leftover number of each milk type served. If recording milk on a sheet separate from the transport sheets, please also submit one week of completed transport sheets to show that leftovers are being recorded for all items including condiments.

3. Resource Management

Comments/Technical Assistance/Compliance Reminders:

REMINDER: SFAs are required to have a *local meal charge policy* in place no later than July 1, 2017. More information, resources and best practices may be found on the School Nutrition Team <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>, scroll down to the unpaid meal charges section.

USDA has established four areas for compliance in the Resource Management area. A series of questions related to: Maintenance of the Nonprofit School Food Service Account, Paid Lunch Equity, Revenue from Nonprogram Foods, and Indirect Costs was sent to the SFA at least 4 weeks prior to the AR. Based on the answers the school triggered what is called a *Comprehensive Review*. For your school a comprehensive review was conducted in the Maintenance of the Nonprofit School Food Service Account and the Revenue from Nonprogram Foods areas. A series of follow up questions in both areas were sent to Laura and Mary Petrie to determine compliance.

Maintenance of the Nonprofit School Food Service Account:

Finding: The annual financial report (AFR) report had not been submitted at the time the review questions were sent. The secretary submitted the report but the report showed a negative ending balance and I could not validate the line items submitted on the financial report based on the financial reports submitted off site. During the onsite review together we looked at the financial records maintained in the Quick Books account and attempted to correct the report.

Corrective Action Required: During the AR we spent time with the secretary going through the detailed financial reports in an attempt to correct the report for the 2015-16 fiscal year. We arrived at figures to correct the report. I would recheck these numbers to ensure that the ending balance in the food service account is still not in the red (negative) and/or have a church or school accountant/auditor go thru the financial records to correctly complete the report and to arrive at the correct ending balance in the food service account since this will be used for completion of the annual financial report for the 2016-17 SY. My figures still show a loss of \$1395.98 in the food service account. If this number is correct you will need to transfer funds from a non-federal (School or Church account) to cover the loss in the program. **Please email when the secretary has submitted the updated report and it will be checked.**

Since there is a need for the secretary to obtain a number of continuing education hours for Professional Standards, I highly recommend that she review the webcast on the AFR before June 30, 2017. Time was also spent working with school staff to review financial reporting for the program for the SY 2016-17 SY. Applicable school staff might also consider attending the more detailed summer training (School Nutrition Skills Development) about this report next summer.

Revenue from Nonprogram Foods

Comments/Technical Assistance/Compliance Reminders:

The focus of this area is to ensure that revenues from the sale of food items that are not part of the reimbursable meal program cover the cost to purchase these items. Prior to the review the school indicated only milk and non-reimbursable (adult/visitor meals) were being sold. Brenda was able to show via invoice and Fast Track records the amount charged for extra milk covered the cost of the milk.

For the non-reimbursable meals served (e.g. visitors and teachers) I showed the secretary how to use the DPI Adult Meal Pricing Guide to arrive at the minimum amount to charge for any nonprogram meals served. The amount listed on the contract of \$4.40 per meal more than covers the cost of the meal including labor costs. To date only a couple of non-program meals have been served. The secretary will need to be sure to track these meals as they need to be reported along with the milk as a revenue and an expenditure on the line item Non-Program Foods for the 2016-17 AFR. When the AFR is completed this school year if there is a loss in any program area it will show up and the SFA will need to transfer funds from another account to cover the loss for that particular program area.

Findings and Corrective Action Needed:

Finding: In discussing the revenue from non-program foods, and money collection procedures it was discovered that Fast Direct had not been set up to correctly charge the *free student* for snack milk or cold lunch milk consumed.

Corrective Action Required: The secretary was able to correct the error in the software, but will need to manually go back through the meal/milk count records to determine the amounts owed for the extra milk served to the free meal households to date. A letter will need to be sent explaining to households that milk cannot be served at no charge, only the lunch meal is free, and to let the hh know the amount that should be remitted to their fs account.

For corrective action please send a copy of the letter sent to households, and/or another option is for the cost of the milk to be covered by another school or church account. Additionally, please send proof of the transfer or deposit of funds into the Quick Books account to show this is occurring.

4. General Program Compliance

Civil Rights

Comments/Technical Assistance/Compliance Reminders:

During the review we discussed requirements for accommodating children with special dietary needs. Per the secretary, at this time there are no requests for meal accommodations. Until recently regulations only *required* schools to make meal accommodations if a licensed medical professional provided documentation to establish that the student has a *disability*. Recent passage of the American with Disabilities (ADA) Amendments Act, most physical and mental impairments constitute a disability. So, rather than focus on whether or not the student has a disability, schools should now focus on ensuring equal opportunity to participate in the meal programs.

If accommodations are made without out medical statement, the student must be offered all meal pattern components and select at least three (this includes selection of at least ½ cup fruit or vegetable) per your offer versus serve policy.

DPI will be updating the *Dietary Request* form soon to meet modified requirements regarding accommodations for students with special dietary needs. Since medical authorities no longer need to check a box to indicate if the child's medical condition is a "disability." The form will still require the medical authority to indicate the following: types of foods to be avoided, a list of foods to be substituted; and require a description of the modifications needed to accommodate the child's needs. If the form is completed by a medical authority the school will be required to meet the student's dietary needs/meal accommodations.

Findings and Corrective Action Needed:

Finding #1: The parent back to school informational letter, website information about the lunch program, and the school handbook used an incorrect non-discrimination statement.

Corrective Action Needed: These documents should contain the full statement:

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race,

color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

(1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW Washington,
D.C. 20250-9410;

(2) fax: (202) 690-7442; or

(3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.

Please develop a plan to update these documents adding the corrected statement. Remember to use the same font size as the majority of the font in the document. *Submit the timeline for updating as corrective action.* Note also each of these documents should include an updated description of current money collection procedures (i.e. meal tickets no longer are used).

Finding #2: The SFA submitted the public release to the local newspaper as required but did not complete any community or grassroots outreach.

Corrective Action Needed: Community outreach includes providing the release to reach out to minority or other underrepresented groups. Venues includes: churches, daycares, food pantries, WIC clinics, Boys and Girls Clubs, etc. (refer to the Civil Rights training Power Point for more suggestions, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/ppt/civil-rights-training.pptx>. *Please give some thought to how this requirement can be accomplished for your school in the future and submit your plan as corrective action.*

Also remember to inform local employers contemplating layoffs about the availability of your school's nutrition program and free/reduced price meals. This will help to remind those affected by the layoff that the hh may be eligible to receive financial relief by way of their potential qualification for free or reduced price meal benefits. This is also discussed in the Civil Rights Power Point.

Local School Wellness Policy (WP)

Comments/Technical Assistance/Compliance Reminders: The school's wellness policy was reviewed. The policy was comprehensive and contains goals that will allow for measurable outcomes at the time of assessment.

The local wellness policy requirement was established by the 2004 Child Nutrition Programs Reauthorization and further strengthened by the Healthy, Hunger-Free Kids Act of 2010. On July 29, 2016 regulations were finalized to create guidelines for written wellness policies established by School Food Authorities (SFAs). *The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.* A summary of the final rule was provided during the onsite review.

Content of the Wellness Policy

At a minimum the wellness policy must include:

Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs (Local Education Agency) are required to review and consider *evidence-based strategies* in determining these goals.

Evidence based strategies have been evaluated rigorously in studies and have been subject to critical peer review. Evidence based strategies are strategies so effective that they are supported by experts in the field – not just the people who developed and evaluated the program. At a minimum, School Food Authorities (SFAs) should review “Smarter Lunchroom” tools and strategies since these are evidence based, simple, lowcost or no-cost changes that have been shown to improve participation in the meal programs and at the same time encourage students to consume more whole grains, fruits, vegetables, and legumes, ultimately reducing platewaste. For more information on Smarter Lunchrooms, visit <http://dpi.wi.gov/team-nutrition/smarter-lunchrooms>.

- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

SFAs must complete an *assessment of the policy every three years* to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the *Triennial Assessment* available to the public.

In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis. You have done this already-good job!

Recommendations for update to your school WP include the following:

- Section I, heading, *Nutritional Quality of Foods and Beverages Sold and Served on Campus* seems to be more appropriate as the heading beginning with the second paragraph on the next page of your WP: **Foods and Beverages Sold Individually**. The heading for Section I.

seems to fit more under either the area of *Nutrition Education* or *Nutrition Promotion* or as a preamble to your policy.

- Under Sharing of **Lunches Sent from Home**, first bullet point- How do you monitor this? Maybe add some language about the availability of milk at school in lieu of sending less nutritious soda.
- **Foods and Beverages Sold Individually** – We recommend that you put the machines on a timer to ensure soda is not available during the school day. See also corrective action under Smart Snacks. Foods/beverages that are not SS compliant must *not be available* for sale from midnight until 30 minutes after the end of the school day.

I am not sure the next para stating that the SASD food service program will approve and provide all food and milk sales.....is accurate. If your school's WP was a copy of the SASD policy please be sure to modify the district policy to fit the wellness initiatives important to Immanuel Lutheran School. Remove language in policy that refers to *district*.

The references to **Rewards, Celebrations, and School-sponsored Events** should come under the heading *Standards and Nutrition Guidelines for all foods/beverages provided, not sold to students*. For the school sponsored events it is good to have policy language but recommend there be a header statement as to what foods/beverages are sold within school. You can use the SS guidelines to write this section.

- Under the heading **Nutrition standards for foods and beverages sold individually** this language is **not current or allowable** for the age group, i.e. elementary and middle school. Please refer to the SS guidelines, <http://dpi.wi.gov/sites/default/files/imce/schoolnutrition/pdf/smart-snacks-in-a-nutshell.pdf>. May want to clarify the types of milk offered for sale at the school. The sodium language is not current for the entrée or snacks. Juice must be 100% juice.
- Under **Portion Sizes** any items offered for sale during the school day must meet SS nutrient standards. Recommend you run each item thru the Food Product Calculator <https://foodplanner.healthiergeneration.org/calculator/> prior to purchase of snack items.
- Need goal(s) for **nutrition promotion**; e.g. school garden, encouraging purchase of local foods in lunch program, farm to school, culinary education.
- Add policy language specific to food and beverage marketing and advertising for only those foods that are Smart Snacks compliant. This may not be applicable too much to your school since no Smart Snacks are sold and there does not appear to be food advertising anywhere in the school.
- Add language to describe public involvement in the development and updates (required triennial assessment), and evaluation of the WP. Keep copies of WP meetings/minutes, and document WP committee members.

Professional Standards (PS)

Professional Standards regulations established minimum hiring standards for school nutrition directors and annual training requirements for ALL staff. This regulation took effect **July 1, 2015**. Here is the link to the DPI summary of the regulation, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-in-a-nutshell.pdf>. A copy of the summary was also left with the school during the onsite AR. NOTE: WI DPI has allowed SFAs flexibility to complete the annual training requirements over a 2 year period.

Findings and Corrective Action Needed:

Finding #1: At the time of hire, August 15, 2015 minimum hiring standards for the size of your school were not followed, specifically the requirement to have 1 year relevant experience in school nutrition, and at least 8 hours of food safety training.

We have a much recent discussion here at DPI regarding the “hiring criteria” as it pertains to the Professional Standards regulation specifically for small schools and NEW programs. The regulations require each School Food Authority (SFA) to designate at least one staff member as the *Food Service Director*. The person in this capacity handles the majority of the food service program duties. Though this is a local decision, it is my interpretation that this person is the School Secretary for Immanuel Lutheran School.

Corrective Action Needed: In WI our policy for schools with enrollments under 500 is that new directors hired after July 1, 2015 must have at least a high school diploma (or GED) AND at least 1 year *relevant experience in school nutrition*. I briefly asked the secretary about her qualifications and if I am correct she has fulfilled the minimum educational requirements but NOT the school nutrition program experience part of the requirement. If this is correct, we are requesting that the principal for the school complete the exemption form (copy will be sent via email), and provide a brief explanation as to why the secretary was the best candidate for the position. **Please complete this form and email it back to me by the corrective action due date.** In the future please contact our office prior to hire of a new food service director to complete this form.

Finding #2: In preparation for the review the secretary made some efforts to document training she has taken since her hire. Staff at the school that need to meet the PS requirements includes: the secretary and the server. The secretary should meet continuing education hours for the *Director* category and the server needs to meet continuing education hours for *Part Time Staff*.

Training is minute for minute and should be tracked. There are two tracking tools: DPI and USDA. Here is the link to the tools, <http://dpi.wi.gov/school-nutrition/professional-standards>, and scroll down to **Tracking Resources**.

Corrective Action Needed: Please review training completed for the 2015-16 SY and to date for the 2016-17 SY for the secretary and the server. *Document completed training on one of the tracking tools and submit for corrective action. In addition to the tracking tool, develop a written plan to ensure the two year compliance can be met this year for both staff.*

For upcoming training opportunities please use the training webpage, <http://dpi.wi.gov/school-nutrition/training>. Remember: Viewing webcasts and webinars count toward the PS requirements.

Water

Findings and Corrective Action Needed:

Finding #1: The Healthy Hunger Free Kids Act Regulations (2010) requires water be made available to students during the lunch and breakfast (not applicable) meal services. There is no readily available water in the cafeteria for students.

Corrective Action Needed: Schools can provide free water in a variety of ways, such as water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups. Please review these recommendations and indicate in writing your intent to comply.

Food Safety, Storage and Buy American

Comments/Technical Assistance/Compliance Reminders:

The food safety area is monitored by the local health inspector twice per year. We recommend that you discuss the following comments and corrective action with your inspector at the time of the next inspection. Good efforts were made as a result of a recent food safety inspection (spring 2016) to update your school's specific food safety plan. The milk cooler temperature and the food temperatures are recorded on the food production record.

Review of the food safety plan found the following omissions:

- The *cleaning logs* for the milk cooler and any cooler/refrigerator units used do not seem to be completed any longer. Recommend these be reinstated.
- I left some tabs throughout the food safety plan where check marks need to be inserted within the various Standard Operating Procedures (SOPs). Please update accordingly.
- The food safety (fs) plan should be reviewed and as needed updates made *annually*. Be sure to *document* that updates or the review has occurred. We recommend comparing your plan to the DPI fs plan and update SOPs as needed. Here is a link to the food safety plan, http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/fsp_may14_1.doc.
- Discuss with your health inspector completion of the Process 1 and 2 lists and check the box for applicable SOPs. I recommend you check through the SOPs in your current fs plan to only keep those applicable to your food service operation, i.e. receiving kitchen, with no re-heat, and discard all leftovers.
- The server also needs to complete the *Employee Reporting Agreement*. Please have her do this and put both the secretary and server's forms in a section of your fs plan.

Findings and Corrective Action Needed:

Finding #1: The most recent food safety inspection report was not publicly posted as required.

Corrective Action Needed: Please make a copy of the fall 2016 inspection and post near the Justice for All poster. Keep the original copies in a section with your fs plan to comply with record retention requirements. *For corrective action indicate your intent to comply, or take a photo and submit to show the report has been posted.*

Smart Snacks:

Findings and Corrective Action Needed:

Finding #1: Immanuel Evangelical Lutheran School is currently selling some foods and beverages during the school day that do not meet the Smart Snacks guidelines. Two vending machines with

non-compliant beverages (such as sports drinks and soda) are on during the school day, and while it doesn't seem like students purchase beverages from it often, it is unallowable to have these types of beverages available to elementary and middle school students during the school day. The only allowable beverages for grades K-8 are plain water, 100% juice (up to 8 fluid ounces), and certain milk types (up to 8 fluid ounces). If you wish to leave the current products in these vending machines, the machines must be turned off from midnight until 30 minutes after the end of the instructional day.

There is also a Snack Shack that sells snacks, such as fruit snacks, fruit roll ups, and chips, to students during the school day on Fridays. If this fundraiser continues to operate regularly, the any foods and beverages sold must meet the Smart Snacks guidelines. More information on the general and nutrient standards can be found on our website:

<http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/smart-snacks>.

Technical assistance was given on the possibility of asking Sheboygan Area School District if they are willing to provide Immanuel with a list of Smart Snacks compliant snacks that they sell. This will give you a good starting point for items you can sell in the Snack Shack. Moving forward, make sure to use the Smart Snacks Calculator

(<https://foodplanner.healthiergeneration.org/calculator/>) to check if foods and beverages meet the guidelines. The School Nutrition Team has a helpful webcast on the basics of the rule that you may want to watch: <http://dpi.wi.gov/school-nutrition/training/webcasts/ss>.

As a school, you must keep track of foods and beverages sold during the school day. There are tracking tools you may use on our Smart Snacks webpage, but you can use whatever works best for you. The tracking tool is simply a way for you to show that you have checked the items for compliance. Ideally, one person in the school should be responsible for keeping track of what is sold and checking items for compliance.

Corrective Action Needed: Please submit a written statement explaining what you will do to ensure that the foods and beverages sold at Immanuel during the school day meet Smart Snacks guidelines. Please explain in detail how you will check items for compliance, what type of tracking tool will be used, and who will be responsible for these tasks.

Buy American

Comments/Technical Assistance/Compliance Reminders:

Regulations took effect with the start of the 2016-17 SY for the *Buy American provision*.

This provision requires SFAs to purchase, to the maximum extent practicable, *domestic commodity or product*.

"Domestic Commodity or Product" are defined as an agricultural commodity that is produced in the United States and a food product that is processed in the United States using substantial agricultural commodities that are produced in the United States.

"Substantial" means that over 51 percent of the final processed product consists of agricultural commodities that were grown domestically.

Products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowed under this provision as territories of the United States.

The Buy American provision (7 CFR Part 210.21(d)) is one of the procurement standards SFAs must comply with when purchasing commercial food products served in the school meals programs.

The AR requires the State Agency to assess compliance by checking 1-2 items in a variety of food categories.

The following items were found to be non-compliant:

Canned mixed fruit, pineapple, and mandarin oranges from Thailand. Canned peaches were from China.

Recommendations for compliance (Suggest you share this section of this AR report with the Food Service Director for the SASD.)

-Add Buy American clause to the joint agreement. DPI is planning to develop a certification form for joint agreements to show compliance with the Buy American provision. In the certification the selling agency and meal vendors would need to describe how they ensure compliance with the Buy American provision. It may be a best practice for SASD to provide you with a copy of the tracking form for those non-domestic food/beverage purchases. See next bullet point.

-Some products will not be grown domestically, such as pineapple and mandarin oranges. SASD staff should be checking with their food vendors to see if these products are available domestically. If they are not, document on the Non-compliant Product List, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>. Other possible reasons for not purchasing domestically includes: cost, seasonality, availability, and substitution.

-If ordering online check with vendor to see if there is a link for determining the origin of the product.

-Bid documents should also include Buy American language. I am sure that SASD has this language in the food contracts.

Reporting and Recordkeeping

Comments/Technical Assistance/Compliance Reminders: When asked how long food service records were kept the secretary said that records are kept for 7 years.

USDA requires food service records to be kept for 3 years plus the current year, or 3 years after the final claim for reimbursement for the fiscal year or until audit resolution of any audits. Please check with your school or church auditors regarding the disposition of the food service records at the earlier date referenced above.

Summer Food Service Program Outreach (SFSP)

Comments/Technical Assistance/Compliance Reminders:

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at Immanuel Lutheran School USDA requires that all SFAs inform families of where their students can receive a free meal in the summer months. *SASD offers the SFSP and has provided your school with a copy of their brochure promoting the program. This brochure was sent home in the Thursday folder at the end of the 2015-16 SY. Great efforts! Here are some*

additional ways that SFAs can inform families about the locations for summer meals in your area:

- Promotion of the summer meals locator on the DPI Summer Meals website ○

Promotion of calling 211 to locate meals in the area ○ Promotion of the ability to text 'food' to 877-877 to locate meals in the area ○ Promotion of the USDA Summer Food website

<http://www.fns.usda.gov/summerfoodrocks>.

- For more information on Summer Feeding option contact:

Amy J. Kolano, RD, CD

Summer Food Service Program Coordinator Phone:

608.266.7124 e-mail: amy.kolano@dpi.wi.gov